

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION**

RACHEL ALDRIDGE, as Surviving Mother  
of Brooklyn ALDRIDGE, Deceased,

Plaintiff,

v.

BEVERLY BEAUMIER, CLINTON  
WAYNE HARPER, and MONICA  
BROWN.

Defendants.

CIVIL ACTION NO.

5:21-CV-15

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**NOTICE OF REMOVAL**

COMES NOW Defendant Beverley Beaumier (“Beaumier”), through counsel, and files this Notice of Removal pursuant to 28 U.S.C. §§ 1441(a), 1441(c), and 1446. Defendant Beaumier files this notice subject to, and without waiving, any defenses available under state and federal law, and in support shows the following:

1. On March 6, 2020, Plaintiff filed a civil action in the Superior Court of Pierce County, Georgia, styled Rachel Aldridge, as Surviving Mother of Brooklyn Aldridge, deceased v. Beverly Beaumier, Clinton Wayne Harper, Monica Brown and Infinity Possibilities Counseling Services, LLC, and bearing Civil Action File No. SUCA20200000068 (the “Action”). Attached hereto as Exhibit “A” is a copy of all process and pleadings served on Defendant Beaumier and filed in the Action.
2. The Action originally alleged only state law tort claims against Defendants. Plaintiff amended her complaint three times adding additional state law claims. Plaintiff filed a Fourth Amended Complaint on January 15, 2021. The Fourth Amended Complaint

added Federal claims brought pursuant to 42 U.S.C. § 1983 against Beaumier. Plaintiff's Fourth Amended Complaint alleges violations of due process and familial association under the United States Constitution for allowing Ron Lott to gain temporary custody of Brooklyn Aldridge, without a proper background check. Defendants Beaumier and Monica Brown were employees acting within the course and scope of their official duties or employment for the Georgia Department of Human Services, specifically the Department of Family and Children's Services ("DFCS"), at the time of the incident.

3. The Action presents federal questions over which this court has original subject matter jurisdiction pursuant to 28 U.S.C. § 1331, as well as questions of state law over which this court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.
4. The Action is one that may be removed to this Court pursuant to the provisions of 28 U.S.C. § 1441(a) and 1441(c).
5. Venue is proper in the Waycross Division of the Southern District of Georgia. *See* 28 U.S.C. §§ 90(a)(2); 1441(a).
6. Pursuant to 28 U.S.A. § 1446(b)(2)(A), all of the Defendants who have been properly served in the Action at the time of the filing of this notice consent to this removal. Attached as Exhibit "B" is Defendant Monica Brown's written consent to removal. Attached as Exhibit "C" is Defendant Clinton Wayne Harper's written consent to removal. Infinite Possibilities Counseling Service, LLC has been dismissed from the case.
7. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty (30) days from the earliest day on which Defendant Beaumier received, through service or otherwise, a copy of Plaintiff's Fourth Amended Complaint.

WHEREFORE, Defendant Beaumier respectfully request that this Notice of Removal be filed, that the action be removed to and proceed in this Court, and that no further proceedings be had in the Action in the Superior Court of Pierce County.

This 15<sup>th</sup> day of February, 2021

Respectfully submitted,

/s/ Paul Henefeld  
Paul Henefeld, Esq.  
Georgia Bar No. 346755  
Noah Green, Esq.  
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*Attorneys for Defendant Beaumier*

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day served counsel for the opposing parties with a copy of **Notice of Removal** by filing same with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record:

Brent J. Savage, Esq.  
*Attorney for Plaintiff*  
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Leslie Kennerly, Esq.  
J Holder Smith, Jr., Esq.  
*Attorneys for Defendant Harper*  
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This 15<sup>th</sup> day of February, 2021.

Respectfully submitted,

/s/ Paul Henefeld

Paul Henefeld, Esq.

Georgia Bar No. 346755

*Attorney for Defendant Beaumier*

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